

Rocky Flats Citizens Advisory Board Recommendation 2003-6

Comments on Draft RFCA Standard Operating Protocol for the Consolidated Water Treatment Facility

Approved August 7, 2003

Letter to: Mr. John Stover U.S. Dept. of Energy Rocky Flats Field Office 10808 Hwy. 93, Unit A Golden, CO 80403

Dear Mr. Stover:

The Rocky Flats Citizens Advisory Board appreciates the opportunity to review the Draft RFCA Standard Operating Protocol for the Consolidated Water Treatment Facility (CWTF), Revision 0, June 2003. We offer the following comments on the RSOP.

Acceptance of Additional Wastewaters

The B891 RSOP proposes expanding the role of the treatment facility to include wastewater from D&D activities associated with the south side buildings, such as B881, B444, B883, and B865. It is stated that wastewater from plutonium buildings (i.e. B707, B771/774, B371/374 and B776/777) is not expected to be suitable for treatment for B891, yet the document does not clearly state that B891 will be prohibited from receiving wastewater from these buildings. Please revise the document to state that the unit will not receive any wastewater from the plutonium buildings during the decontamination operations of the facilities, nor accept other wastewater streams that contain plutonium and americium.

Clarify on Page 20 what "other activities" may be considered that will generate wastewater not associated with remediation.

Pond C-2 Capacity

The B891 RSOP mentions if the treatment unit operates at full capacity, the CWTF discharges would amount to less than 7% of the capacity of Pond C-2. Clarify if the percentage is based on an average year of rainfall. Provide us with a Contingency Plan for the wastewater if due to a major storm event or a wet year the C-2 Pond is at full

capacity and cannot accept additional inflow.

Records Disposition

Add the College Hill Reading Room to the list of identified repositories for the Administrative Record files for the RFETS Project.

We hope that you are able to address these issues in the final B891 RSOP and look forward to hearing your response.

Sincerely,

Victor Holm Chair

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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